

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MOBILITY WORKX, LLC,
Plaintiff,

v.

Ericsson, Inc., Defendant.

Case No. 4:24-cv-00796-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC,
Plaintiff,

v.

Nokia Corp. et al.,
Defendants.

Case No. 4:24-cv-00797-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC,
Plaintiff,

v.

Samsung Elecs. Co., Ltd. et al,
Defendants.

Case No. 4:24-cv-00798-ALM

JURY TRIAL DEMANDED

MOBILITY WORKX, LLC,
Plaintiff,

v.

Cisco Systems, Inc.,
Defendant.

Case No. 4:24-cv-00799-ALM

JURY TRIAL DEMANDED

[PROPOSED] SCHEDULING ORDER

Tuesday, April 8, 2025	Initial Rule 16 Management Conference at 9:00am to be held via Zoom or telephone
Friday, April 25, 2025	P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
Tuesday, May 13, 2025	Join Additional Parties.

Tuesday, June 3, 2025	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
Wednesday, June 11, 2025	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
Tuesday, July 1, 2025	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
Tuesday, July 22, 2025	Parties' Final Amended Pleadings (A motion for leave is required).
Wednesday, July 30, 2025	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.
Tuesday, August 5, 2025	Respond to Amended Pleadings.
Wednesday, August 13, 2025	Completion date for discovery on claim construction (P.R. 4-4).
Tuesday, August 26, 2025	Opening claim construction brief (P.R. 4-5(a)).
Wednesday, September 10, 2025	Submit technology synopsis/tutorial (both hard copy and disk).
Wednesday, September 24, 2025	Responsive claim construction brief (P.R. 4-5(b)).
Friday, September 26, 2025	Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
Wednesday, October 1, 2025	Reply claim construction brief (P.R. 4-5(c)).
Wednesday, October 8, 2025	Claim Construction hearing at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
Wednesday, November 12, 2025	Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.
Wednesday, November 12, 2025	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
Wednesday, November 12, 2025	Comply with P.R. 3-7. (Designation of Willfulness Opinions).
Friday, December 19, 2025	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
Friday, January 23, 2026	Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their

	expert witness report, to include for ALL experts all information set out in Rule 26(2)(B).
Tuesday, February 10, 2026	Discovery Deadline
Friday, February 20, 2026	<p>File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7.</p> <p>Responses to motions shall be due in accordance with Local Rule CV-7(e).</p>
Friday, February 20, 2026	Objections to opening and rebuttal experts, including Daubert motions. Such objections and motions are limited to ten pages each.
Monday, April 13, 2026	Notice of intent to offer certified records.
Monday, April 13, 2026	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order (See www.txed.uscourts.gov) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).
Friday, April 17, 2026	<p>Motions in limine due.</p> <p>File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies</p>
Monday, April 20, 2026	<p>Deposition Designation due. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross-examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court.</p> <p>The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.</p>
Monday, May 4, 2026	<p>Response to motions in limine due.</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference. File Proposed Jury Instructions/Form of Verdict</p>

	(or Proposed Findings of Fact and Conclusions of Law). If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris_Bickham@txed.uscourts.gov, by this date.
Monday, May 18, 2026	Final Pretrial Conference at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
TBD	10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.